

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

VIVIAN BERT, et al.,

**Plaintiffs,**

**V.**

**AK STEEL CORPORATION,**

**Defendant.**

**CASE NO. C-1-02-467**

## Judge Beckwith

**Magistrate Judge Hogan**

## **JOINT MOTION TO EXTEND DEADLINES FOR EXPERT REPORTS**

The plaintiffs and the defendant jointly and respectfully move this Honorable Court to extend discovery deadlines for expert reports in the above-cited matter. In support of their motion, the movants state as follows:

1. Deadlines for expert reports are currently set by this Court's Order (Doc no. 32) filed on February 27, 2004, as follows:

### Plaintiffs' experts reports -- July 1, 2004

Defendant's experts reports -- **August 15, 2004**

## Plaintiffs' expert report replies -- **October 1, 2004**

Discovery Deadline with respect to experts on class issues - **November 1, 2004**

2. The plaintiffs' counsel and the defendant's counsel have recently engaged in productive settlement negotiations. While a settlement has not been reached, negotiations are ongoing.

3. In light of these ongoing negotiations, both plaintiffs and the defendant ask that the deadlines for expert reports be extended as follows:

## Plaintiffs' experts reports -- September 1, 2004

Defendant's experts reports -- **October 15, 2004**

Plaintiffs' expert report replies -- **November 15, 2004**

Discovery Deadline with respect to experts on class issues - **December 1, 2004**

Wherefore, for the above-stated reasons, the movants respectfully request that this Honorable Court grant an extension of time for expert reports as stated.

Respectfully submitted,

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